

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 3:20-CR-00021
	)	
ANMING HU	)	
	)	

**DEFENDANT’S MOTION FOR**  
**SPECIFIC JURY QUESTIONNAIRE**

Now comes Anming Hu, by and through counsel, and moves this Honorable Court to use a jury questionnaire that will protect his right to a fair trial.

The Defendant is entitled to a fair and impartial jury. Under the present political and cultural climate in this country, this Honorable Court has a heavy burden to uphold the Defendant’s rights under the Sixth Amendment.

For the reasons stated in the accompanying brief, the Court’s standard Jury Questionnaire will not ensure the Defendant has the best chance of a fair and impartial jury to try this case. The Government has refused to join in on this motion, even though the proposed questionnaire would help the Government select fair jury, as well.

WHEREFORE, the Defendant requests this Honorable Court grant the use of a specific jury questionnaire similar to the one attached to the Brief in support of this motion.

Respectfully submitted this 28th day of April, 2021.

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**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by U. S. Mail. Parties may access this filing through the Court's electronic filing system.

s/A. Philip Lomonaco